

Proceeding: **UNIVERSAL SERVICE** ☒ Record 1 of 1 **DOCKET FILE COPY ORIGINAL**  
Applicant Name: **Lawanda R. Gilbert**  
Proceeding Name: **96-45** Author Name: **Lawanda R. Gilbert**  
Lawfirm Name: **New Jersey Division of the Ratepayer Advocate**  
Contact Name: **author\_name** Contact Email: **lgilbert@rpa.state.nj.us**  
Address Line 1: **31 Clinton Street, 11th Floor**  
Address Line 2: **P.O. Box 46005**  
City: **Newark** State: **NJ** ☒  
Zip Code: **07101** Postal Code:   
Submission Type: **CO** ☒ Submission Status: **DISSEMINATED** ☒ Viewing Status: **UNRESTRICTED** ☒  
Subject:   
DA Number:  Exparte Late Filed: ☐ File Number:   
Calendar Date Filed: **05/22/1998 10:37:34 AM** Date Disseminated: **05/22/1998**  
Official Date Filed: **05/22/1998** Filed From: **INTERNET**  
Confirmation # **1998522867319**

**INTERNET FILING**

96-45

5/22/98

**RECEIVED**

MAY 22 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

No. of Copies rec'd 1  
List A B C D E

**STATE OF NEW JERSEY  
DIVISION OF RATEPAYER ADVOCATE  
31 CLINTON STREET - 11TH FLOOR  
P.O. BOX 46005  
NEWARK, NEW JERSEY 07101**

**RECEIVED**

MAY 22 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

BLOSSOM A. PERETZ, ESQ.  
Ratepayer Advocate  
and Director  
May

CHRISTINE TODD WHITMAN  
Governor

21, 1998

**VIA EXPRESS MAIL**

Maggie Roman Salas, Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

**Re: Proposed Revision of Maximum Collection Amounts for  
Schools and Libraries and Rural Health Care Providers  
Public Notice  
CC Docket No. 96-45  
DA 98-872**

TO THE HONORABLE COMMISSION:

Enclosed please find an original and six copies of Comments to be filed with the Commission in the above-referenced matter. Please time/date stamp the additional copy and return it to the undersigned in the enclosed, stamped envelope. Also please note that an exact copy of these comments are being submitted electronically via the Internet.

Respectfully submitted,

BLOSSOM A. PERETZ, ESQ., RATEPAYER ADVOCATE,  
RATEPAYER ADVOCATE

NJ DIVISION OF THE

By: \_\_\_\_\_  
Lawanda R. Gilbert, Esq.  
Assistant Deputy Ratepayer Advocate

cc: Sheryl Todd, Accounting Policy Division, Common Carrier Bureau (3)  
ITS

**Before the**

**FEDERAL COMMUNICATIONS COMMISSION**  
**Washington, D.C. 20554**

**Proposed Revision of  
Maximum Collection Amounts  
for Schools and Libraries  
and Rural Health Care Providers**

**Public Notice**

)  
)  
)  
)  
)  
)

**CC Docket No. 96-45**

**DA 98-872**

**COMMENTS OF THE NEW JERSEY DIVISION OF THE RATEPAYER ADVOCATE**

**NEW JERSEY DIVISION OF THE RATEPAYER ADVOCATE  
31 Clinton Street  
P.O. Box 46005  
Newark, New Jersey 07101**

**Blossom A. Peretz, Esq.  
Ratepayer Advocate**

**Heikki Leesment, Esq.  
Deputy Ratepayer Advocate**

**Lawanda R. Gilbert, Esq.  
Assistant Deputy Ratepayer Advocate**

**May 21, 1998**

## TABLE OF CONTENTS

INTRODUCTION .....	1
I. ALL ELIGIBLE SCHOOL AND LIBRARY APPLICANTS SHOULD RECEIVE THE UNIVERSAL SERVICE BENEFITS PROMISED UNDER THE 1996 ACT.....	3
II. ELIGIBLE NEW JERSEY SCHOOLS THAT APPLIED IN A TIMELY FASHION SHOULD NOT BE DENIED FUNDING .....	7
III. WITHOUT ADEQUATE FEDERAL UNIVERSAL SERVICE FUNDING, ELIGIBLE NEW JERSEY SCHOOLS AND LIBRARIES MAY BE UNABLE TO OBTAIN ACCESS TO ADVANCED TELECOMMUNICATIONS SERVICES.....	10
IV. THE FCC MUST RETAIN FUNDING AT THE \$2.25 BILLION CAP TO ENSURE ADEQUATE AND EQUITABLE FUNDING FOR ALL ELIGIBLE SCHOOLS AND LIBRARIES, PARTICULARLY FOR THE MOST DISADVANTAGED .....	12
V. CONCLUSION .....	14

## INTRODUCTION

Pursuant to 47 C.F.R. §§ 1.49, 1.415, and 1.419, the New Jersey Division of the Ratepayer Advocate ("Advocate" or "Ratepayer Advocate") respectfully submits these comments on the Proposed Revision of Maximum Collection Amounts for Schools and Libraries and Rural Health Care Providers issued by the Federal Communications Commission (FCC) in the above-referenced Public Notice for the implementation of universal service directives under the Federal Telecommunications Act of 1996 ("Act" or "1996 Act").<sup>1</sup> The Ratepayer Advocate is a reorganized state agency created pursuant to the New Jersey Reorganization Plan No. 001-1994<sup>2</sup>. Our traditional role, to protect and advance the interest of residential ratepayers in New Jersey, has been broadened to include representation of all classes of ratepayers -- residential, commercial, industrial and small business -- and to be more involved in the policy and planning of laws and regulations which impact all New Jersey ratepayers. Our new mandate in the area of policy and planning is designed to afford all classes of consumers a stronger voice in long range planning and policy development. We consider New Jersey schools and libraries among the more

---

<sup>1</sup> 47 U.S.C. §§ 151 *et seq.*

<sup>2</sup> See N.J.S.A. 52:27E-50 *et seq.*

important and deserving classes of consumers, and have actively advocated on their behalf in a number of proceedings.

The FCC seeks comment on its proposal which ultimately affects the number of schools and libraries that will be successful in their quest for funding in the provision of discounted telecommunications services, as mandated by the 1996 Act. The FCC's proposal recommends a gradual phase-in of the universal service support mechanisms that will coincide with access charge reductions. To implement this "phase-in," the FCC proposes a reduction in the maximum amounts to be collected and spent during the initial year of implementation of the universal service support mechanisms, to a level which will not increase total dollars paid by long distance carriers for both access charges and universal service fund assessments. Under the FCC's proposal, the quarterly collection rates for the third and fourth quarter of 1998 would be limited to no more than \$524 million/quarter for schools and libraries and \$25 million/quarter for rural health care providers; providing a total funding for the 1998 calendar year of \$1.67 billion for schools and libraries and \$100 million for rural health care providers.

With regard to the proposal, the Ratepayer Advocate's comments are focused on emphasizing the importance of keeping the promise of the 1996 Act which contemplates the deployment of advanced telecommunications services for all eligible schools and libraries at discounted rates. If that promise is not realized, many children across the nation will be denied access to information age technology. We would not like to see that happen, and we don't believe that this is what Congress or the FCC intended.

**I. ALL ELIGIBLE SCHOOL AND LIBRARY APPLICANTS SHOULD RECEIVE THE UNIVERSAL SERVICE BENEFITS PROMISED UNDER THE 1996 ACT.**

The provision of access to information age technology for schools and libraries undoubtedly is one of the most important issues to be tackled by Congress and the FCC in this decade. The Report and Order<sup>3</sup> issued by the FCC in May 1997 (*Universal Service Order*), which adopted the recommendations of the Federal State Joint Board on Universal Service (Joint Board) provided an adequate framework to ensure that the nation's schools and libraries are able to meet the technological needs of all citizens in the information age. The recommendation of the Federal-State Joint Board, which was adopted and approved by the FCC, established the universal service fund for schools and libraries at \$2.25 billion annually. That figure was carefully and deliberately calculated by the Joint Board as the amount required to ensure that every eligible school and library throughout the country receive the benefits mandated by

---

<sup>3</sup> See Federal State Joint Board on Universal Service, CC Docket No. 96-45, *Report and Order* (May 7, 1997).

Congress in the passage of the 1996 Act.

However, subsequent FCC decisions have materially weakened the framework established in the *Universal Service Order*. The ability of schools and libraries to rely on assistance from the federal schools and libraries fund appears increasingly uncertain, and has constantly deteriorated since May 1997. The original maximum collection amount of \$1 billion for the first six months which was set forth in the *Universal Service Order* in May 1997 for support of schools and libraries nevertheless contemplated that the annual cap would remain at \$2.25 billion. In December 1997, the FCC, on its own motion, reduced the collection level to \$625 million for the first half of 1998 in its *Third Order on Reconsideration*,<sup>4</sup> though retaining intact the annual cap at \$2.25 billion. In this current proceeding, the FCC is now proposing to reduce the level of collections in support of schools and libraries for the last half of 1998, and reduce the annual funding cap by some \$580 million. Were the FCC to do that, there can be no doubt that many eligible schools and libraries will be denied benefits intended by the Act.

---

<sup>4</sup> Federal State Joint Board on Universal Service, CC Docket No. 96-45, *Third Order on Reconsideration* (December 16, 1997) at ¶1. (*Third Order on Reconsideration*)

Throughout its implementation of the universal service support mechanisms for schools and libraries, the FCC has continually stated that adjustments in the collection rate were aimed at preventing an accumulation of funding at levels that would exceed demand, and thereby impose unnecessary financial burdens upon carriers contributing to the fund.<sup>5</sup> However, the FCC also consistently emphasized that these reductions in the collection rate "would not jeopardize the sufficiency of the support mechanisms."<sup>6</sup> Although the intent of the FCC's current proposal to tie access charge reductions to the provision of discounts for schools and libraries in order to avoid excessive and unnecessary rate churn is a noble and well meaning goal, we must not lose sight of the fact that this will significantly decrease the availability of much needed funding for schools and libraries seeking to provide students with much needed access to advanced telecommunications services. Thus, regardless of the reasons for considering such a proposal, the hard facts that remain are pointed up by the FCC's own figures: the FCC has already received requests for \$2.02 billion in funding, but now proposes to collect only \$1.67 billion for the 1998 funding year. The irreconcilability of those figures means that a great many schools and libraries will be denied funding for critically needed access to educational technology.

The enormity of the resources needed to complete this task is clearly evident from the from the proposals filed with the fund administrator. However, the importance of the effort for our children and their future is equally compelling. According to a survey to determine interest

---

<sup>5</sup> See *Universal Service Order; Third Order on Reconsideration*.

<sup>6</sup> *Third Order on Reconsideration* at ¶4.

in the E-Rate program conducted by a coalition of schools and libraries organizations, the Education and Library Networks Coalition (EdLiNC), 67% of respondents said that the E-Rate will increase the amount of money they can spend on technology; 73% of respondents said that the E-Rate will increase the use of technology; and 57% said that the E-Rate will allow them to purchase new services.<sup>7</sup>

---

<sup>7</sup> Press Release, *Survey Finds 84% of Schools and Libraries in the US Intend to Apply for E-Rate Discount; Program a Huge Success, Demand for Funding Support from Schools and Libraries Corporation Confirms Overwhelming Need for E-Rate*, EdLiNC (date).

This makes it increasingly important that regulators, educators, librarians and the telecommunications industry work together to provide sufficient technological capability within all schools so that every student and school district is able to obtain the full benefits of educational technology, and work to establish local libraries as community technology centers for the new millennium, providing all citizens with increasingly important electronic access. We cannot permit class distinctions among our children, denying information technologies to some and relegating them to second class futures for lack of information age skills. Equality of opportunity in this context must equate to all schools and school children being treated equally.

In addition, much of the currently requested funding is for internal connections, which is an up-front, one-time expense that, once incurred, will not be required in future years. The FCC acknowledged this fact in its *Third Reconsideration Order*, when it concluded that demand from schools and libraries during the first and second quarters of 1998 wouldn't be substantial enough to reach projected maximums since schools and libraries would most likely not begin the installation of internal connections until the summer when students were not present.<sup>8</sup> Therefore, the FCC is urged to maintain the fund at \$2.25 billion for 1998 and 1999, since it can reasonably be anticipated that funding levels will go down in future years. If schools aren't presently able to receive assistance for internal wiring, they will be unable to make maximum educational use of computers in the classroom.

---

<sup>8</sup> *Third Order on Reconsideration* at ¶6. However, the number of applications filed and

**II. ELIGIBLE NEW JERSEY SCHOOLS THAT APPLIED IN A TIMELY FASHION  
SHOULD NOT BE DENIED FUNDING.**

---

the level of assistance requested would indicate the need for the FCC to reevaluate this premise.

The importance of ensuring that all New Jersey students have sufficient access to educational technology is compelling and undeniable. New Jersey's entire educational community has consistently asserted that the effective use of advanced technology is firmly established as the new "basic."<sup>9</sup> Today, technology is as important an academic skill as the traditional "three R's." Indeed, the Core Curriculum Content Standards set by the New Jersey Department of Education (NJDOE) in 1996 as statewide requirements reflect the increasing importance of technological literacy, requiring students as early as fourth grade to have mastery of computer skills such as word processing and spreadsheets.

---

<sup>9</sup> See *Direct Testimony of Community Network for New Communications Technology (CONNECT) filed on Behalf of the New Jersey Division of the Ratepayer Advocate, In the Matter of the Investigation Regarding Local Exchange Competition for Telecommunications Services, New Jersey Board of Public Utilities, Docket No, TX95120631 (filed August 19, 1997).(CONNECT Testimony).*

Many schools in our state have invested in computer technology and are already providing their students with essential training. But because they cannot afford to provide access to telecommunications services, much of the benefit of that computer equipment is not able to be fully realized. Schools simply do not have funds to pay commercial rates to access the Internet. Reflecting this economic fact are the results of a 1996-97 survey by the New Jersey Department of Education, indicating that only 3.76% of the classrooms in New Jersey public schools have Internet access.<sup>10</sup> Consequently, the ability to access telecommunications services affordably is

---

<sup>10</sup> "1996-97 New Jersey Technology K-12 Survey Report," Quality Education Data, 1997. See Appendix . What is even more distressing is that

---

this lack of classroom connectivity is prevalent in many New Jersey counties and in fact, spans the state geographically. The following geographic comparison data from the survey report illustrates the lack of connectivity in many New Jersey classrooms:

County*	Student Population	#of Classrooms with Internet Access	
Sussex	12,781	46	
Warren	12,667	71	
Somerset	20,191	81	
Morris	31,926	124	
Passaic	28,404	130	
Middlesex	41,546	73	
Ocean	42,784	111	
Cumberland		14,078	33
Gloucester	22,743	19	
Salem	7,480	49	

one of the important functions of the federal universal service support mechanisms; it offers the potential to multiply the benefits of other educational resources.

---

\* This data is based on a 50% response rate (1,170 public schools).

However, the recent actions of the FCC, as well as attacks on the E-Rate by telecommunications carriers and certain members of Congress, call into question the future of this federal universal service program to fulfill its intended role. The actual experience of the current application period provides clear evidence that, under the FCC's proposal, the federal e-rate fund will be depleted prior to receipt of discounts by all schools and libraries that applied in a timely fashion. It is unfortunate that this withdrawal of support on the federal level is coming at the same time that schools and libraries have proved their readiness to bring technology to students and patrons, with estimates from EdLiNC that 84% of the nation's K-12 schools and libraries applied for E-Rate discounts.<sup>11</sup>

---

<sup>11</sup> Press Release, *Survey Finds 84% of Schools and Libraries in the US Intend to Apply for E-Rate Discount; Program a Huge Success, Demand for Funding Support from Schools and Libraries Corporation Confirms Overwhelming Need for E-Rate*, EdLiNC (May 1, 1998).

New Jersey schools jumped at the chance of obtaining federal universal service funding to assist them in providing affordable Internet access to their students. Although more than 30,000 applications were submitted nationally by schools and libraries seeking the E-Rate discount during the 75-day filing window, between January and March 1998, these included almost 1,700 applications from New Jersey's schools, school districts and libraries.<sup>12</sup> New Jersey ranks seventh in the number of applications submitted during that first 75-day period, and the New Jersey Department of Education deserves much credit for those truly remarkable numbers. There is no data yet on the specific amount of funds that have been requested by New Jersey's schools and libraries. It is known, however, that the three state-operated districts, Paterson, Jersey City and Newark, have applied and collectively requested more than \$15 million. If the FCC fails to collect enough funds to provide the total \$2.02 billion requested in discounts, it seems clear that some of the New Jersey schools and libraries that have applied during the first two months of the program will be denied discounts because there's simply not enough money to

---

<sup>12</sup> New Jersey schools and libraries are taking advantage of the opportunities afforded by the federal fund. Following are the figures that reflect how many schools and libraries in New Jersey have applied for discounts from the Universal Service Fund during the 75-day window of opportunity, which closed on April 15, 1998:

464 from single schools (public and non-public)

955 from school districts (public)

220 from library consortiums

27 from multiple entities

**1,666 applications\* from New Jersey's schools and libraries**

\* Applications represent a total of 1,556,807 students and 8,673,144 library patrons.

go around.

**III. WITHOUT ADEQUATE FEDERAL UNIVERSAL SERVICE FUNDING, ELIGIBLE NEW JERSEY SCHOOLS AND LIBRARIES MAY BE UNABLE TO OBTAIN ACCESS TO ADVANCED TELECOMMUNICATIONS SERVICES.**

In New Jersey, the affordability of telecommunication services for many schools and libraries is hampered because they are served under the commercial tariffed rates of their local exchange carrier (LEC). Discounts on telecommunications services funded by the universal service fund could play a major role in relieving the fiscal pressures faced by schools and libraries required to pay commercial rates. It must be recognized that for many users, the only practical vehicle for accessing the Internet will be through schools and libraries. In other words, for many citizens, school and library telecommunications provide the means for telecommunications that, for others, *is* residential service.

In addition, New Jersey also faces the obstacle of aging infrastructure. According to the New Jersey Department of Education, 906 of the State's 2,303 schools -- almost half -- are more than 50 years old, with 86 schools older than 90 years.<sup>13</sup> Based on 1992 data provided by the Public Affairs Research Institute of New Jersey, six counties in the northern third of the state have

---

<sup>13</sup> See *School Buildings Age (School Buildings 50 Years or Older)*, New Jersey Department of Education. (*School Buildings Report*).

more than half of their buildings over 50 years old. In the state-designated special needs districts, 64 percent of the buildings are over 50 years old.

Consider the observation of Neil DiLorenzo, Assistant Principal of Wildwood High School: "My school community is committed to moving forward into the 21st century, but my school building -- constructed in 1917 -- stands in the way. The school is three stories high, and our construction costs for wiring and access to classrooms is a major impediment to our progress."<sup>14</sup>

These older schools will be faced with costs of contractors to drill through thick masonry walls, which will be much more expensive than the costs for newer schools. This increased cost is evident in an example provided by the NJDOE, which estimated that the wiring costs for classrooms in a 50-year-old school building could be \$125,000.<sup>15</sup> For large urban areas of the

---

<sup>14</sup> See *CONNECT* Testimony at 14.

<sup>15</sup> See *Direct Testimony of Jeffrey V. Osowski, Assistant Commissioner, New Jersey Department of Education*, In the Matter of the Investigation Regarding Local Exchange Competition for Telecommunications Services, New Jersey Board of Public Utilities, Docket No, TX95120631 (filed August 19, 1997) at 5. "Generally, schools built after 1950 have dropped ceilings and some even have raceways or conduits for easy installation of wiring."

state, where one school district may contain 10 or more buildings that are over 50 years in age, the wiring costs alone of providing one computer for every five students could be enormous.

With schools facing large expenses for internal wiring, the importance of discounts toward the costs of internal access for schools and libraries cannot be overstated. Clearly, discounts for the provision of Internet access and telecommunications services will be meaningless if schools and libraries cannot afford the cost of wiring the facilities for access. The federal universal service discounts will provide assistance to many states, such as New Jersey, which face the challenges presented by wiring classrooms in older school buildings, and thus, may result in greater than average costs for providing access due to the age of the physical plant.

**IV. THE FCC MUST RETAIN FUNDING AT THE \$2.25 BILLION CAP TO ENSURE ADEQUATE AND EQUITABLE FUNDING FOR ALL ELIGIBLE SCHOOLS AND LIBRARIES, PARTICULARLY FOR THE MOST DISADVANTAGED.**

The Public Notice also seeks comment on ways to ensure that the proposed adjustments do not impact the level of support available to the most economically disadvantaged schools and libraries. Although the Ratepayer Advocate shares the FCC's concern that the most needy schools should obtain adequate funding to provide access to advanced telecommunications services for its students, we must remain aware of the underlying consequences which these recommendations will have overall on the equitable distribution of such funding. The rules of

priority<sup>16</sup> previously promulgated by the FCC, generally provide that, once \$2 billion in funds has been expended, the final \$250 million remaining under the \$2.25 billion funding cap will be held to meet funding commitments for eligible schools and libraries which fall into the two most disadvantaged categories. Under the FCC's present proposal however, since only \$1.67 billion is proposed to be collected for disbursement, the \$2 billion trigger would not be reached, and thus, there appear to be no safeguards under the proposed rules to protect funding for the most economically disadvantaged schools and libraries. Conversely, if the FCC intends to retain the last \$250 million for the most disadvantaged schools, it leaves only \$1.42 billion for all others, which is simply inadequate. Clearly, the FCC must adhere to its initial framework as defined in the *Universal Service Order*, to provide for a maximum of \$2.25 billion in funding. This is the only approach that even harbors the hope of every eligible school and library benefitting from the fund.

---

<sup>16</sup> See 47 C.F.R. §54.507(g).

We would also note that the proposed mechanism increases inequities in the current funding distribution system, which have been brought to the FCC's attention by the Ratepayer Advocate in prior filings.<sup>17</sup> As we previously stated, the funding scheme currently does not provide for a fair and equitable distribution of funds for all states. Currently there are no guarantees that schools and libraries from each state will receive any portion of funding, or that each state will receive a pro rata share of funding. The concern that funding may not be equitably distributed based on a state's contributions are heightened under the FCC's proposal, which will plainly fail to satisfy the \$2.02 billion in funding requests from schools and libraries currently pending. The FCC is urged to provide for some conscientious oversight in the distribution of funds that will allow for states to receive funding for its schools and libraries at a level relatively equivalent to the amount which they have contributed to the fund through the FCC's assessment upon their interstate and intrastate telecommunications revenues.<sup>18</sup>

## V. CONCLUSION

The Federal Communications Commission, Congress, and telecommunications companies must work together to keep intact the E-rate, the universal service program that gives

---

<sup>17</sup> See *Comments of the New Jersey Division of the Ratepayer Advocate*, FCC Public Notice, Common Carrier Bureau Seeks Comment on Universal Service Support Distribution Options for Schools, Libraries and Rural Health Care Providers, CC Docket No. 96-45, DA 97-1957.(filed September 24, 1997); *New Jersey Division of the Ratepayer Advocate Petition for Clarification and Reconsideration*, In the Matter of the Federal-State Joint Board on Universal Service, Report and Order, CC Docket No. 96-45 (filed July 16, 1997).

<sup>18</sup> See 47 U.S.C. §54.703(b).

schools and libraries affordable access to telecommunications. To do otherwise would bar countless students from the educational riches of the Internet and distance learning. The Ratepayer Advocate voiced its concerns to the FCC in previous filings on the possible inadequacy of the federal universal fund when we stated: "Schools and libraries could be lulled into a false sense of security if they depend upon the availability of funds to meet the need as documented in their applications, only to discover that the funds have been expended before their application has been considered."<sup>19</sup>

The Ratepayer Advocate urges the FCC to uphold the promises of the 1996 Act to schools and libraries and fully fund all eligible applications for the 1998 funding year by retaining collections at the \$2.25 billion level. We agree with the concerns expressed by the EdLiNC coalition in its letter to the FCC, where they stated:

---

<sup>19</sup> *Comments of the New Jersey Division of the Ratepayer Advocate*, FCC Public Notice, Common Carrier Bureau Seeks Comment on Universal Service Support Distribution Options for Schools, Libraries and Rural Health Care Providers, CC Docket No. 96-45, DA 97-1957 at 2. (filed September 24, 1997)

"A restructuring of this program midstream or an 11th hour lowering of the funding cap will do irreparable harm to communities all across the nation that have undertaken significant, long-term financial obligations in anticipation of this program. Either outcome would not only upset the legitimate expectations of all applicants and leave them "holding the bag," but will work particular harm on the low-income rural and Inner-city communities that the program was designed to benefit most."<sup>20</sup>

The Ratepayer Advocate is confident that the federal universal service mechanisms that provide discounted telecommunications services to schools and libraries can help realize the dream of a true 21st century classroom without walls, where a child's only limitations will be his or her curiosity and ability to dream. We must ensure that the dream is available to all our children.

Respectfully submitted,

BLOSSOM A. PERETZ, ESQ., RATEPAYER ADVOCATE,  
NJ DIVISION OF THE RATEPAYER ADVOCATE

By: \_\_\_\_\_  
Lawanda R. Gilbert, Esq.  
Assistant Deputy Ratepayer Advocate

---

<sup>20</sup> Press Release, *Nation's Schools and Libraries Urge FCC, Congress, and Telecoms to Protect "E-Rate" Program's Affordable Access to Telecommunications*, EdLiNC (March 31, 1998).